

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

STRAGENT, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 20-511 (LPS)
	)	
MERCEDES-BENZ USA, LLC,	)	
MERCEDES-BENZ VANS, LLC,	)	
DAIMLER TRUCKS NORTH AMERICA	)	
LLC and DAIMLER NORTH AMERICA	)	
CORPORATION,	)	
	)	
Defendants.	)	

**MOTION AND ORDER  
FOR ADMISSION *PRO HAC VICE***

Pursuant to Local Rule 83.5 and the attached certifications, counsel moves the admission pro hac vice of Edward J. DeFranco, Jeffrey S. Gerchick, and Brett N. Watkins of QUINN EMANUEL URQUHART & SULLIVAN, LLP to represent defendants Mercedes-Benz USA, LLC, Mercedes-Benz Vans, LLC, Daimler Trucks North America LLC and Daimler North American Corporation in this matter.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

*/s/ Andrew Moshos*

---

Jack B. Blumenfeld (#1014)  
Andrew Moshos (#6685)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899-1347  
(302) 658-9200  
jblumenfeld@mnat.com  
amoshos@mnat.com

*Attorneys for Defendants*

July 7, 2020

**ORDER GRANTING MOTION**

IT IS HEREBY ORDERED that counsel's motion for admission *pro hac vice* of Edward J. DeFranco, Jeffrey S. Gerchick, and Brett N. Watkins is granted.

Dated: \_\_\_\_\_

\_\_\_\_\_  
United States District Judge

**CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE**

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bars of the State of New York and the State of California and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective 9/1/16, I further certify that the annual fee of \$25.00 has been paid ☒ to the Clerk of Court, or, if not paid previously, the fee payment will be submitted ☐ to the Clerk's Office upon the filing of this motion.

Date: July 7, 2020

/s/ Edward J. DeFranco  
Edward J. DeFranco  
QUINN EMANUEL URQUHART  
& SULLIVAN, LLP  
51 Madison Avenue, 22nd Floor  
New York, NY 10010  
(212) 849-7000

**CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE**

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bars of the District of Columbia and the State of New York and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective 9/1/16, I further certify that the annual fee of \$25.00 has been paid ☐ to the Clerk of Court, or, if not paid previously, the fee payment will be submitted ☒ to the Clerk's Office upon the filing of this motion.

Date: July 6, 2020

/s/ Jeffrey S. Gerchick  
Jeffrey S. Gerchick  
QUINN EMANUEL URQUHART  
& SULLIVAN, LLP  
1300 I Street NW, Suite 900  
Washington, DC 20005  
(202-538-8000)

**CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE**

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bars of the State of Texas, the State of New York and the District of Columbia and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective 9/1/16, I further certify that the annual fee of \$25.00 has been paid ☐ to the Clerk of Court, or, if not paid previously, the fee payment will be submitted ☒ to the Clerk's Office upon the filing of this motion.

Date: July 6, 2020

/s/ Brett N. Watkins  
Brett N. Watkins  
QUINN EMANUEL URQUHART  
& SULLIVAN, LLP  
711 Louisiana Street, Suite 500  
Houston, TX 77002  
(713) 221-7030

**CERTIFICATE OF SERVICE**

I hereby certify that on July 7, 2020, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on July 7, 2020, upon the following in the manner indicated:

George Pazuniak, Esquire  
O'KELLY & ERNST, LLC  
824 North Market Street, Suite 1001A  
Wilmington, DE 19801  
*Attorneys for Plaintiff*

*VIA ELECTRONIC MAIL*

Thomas F. Meagher, Esquire  
Alan Christopher Pattillo., Esquire  
MEAGHER EMANUEL LAKS GOLDBERG  
& LIAO, LLP  
One Palmer Square, Suite 325  
Princeton, NJ 08542  
*Attorneys for Plaintiff*

*VIA ELECTRONIC MAIL*

*/s/ Andrew Moshos*

---

Andrew Moshos (#6685)